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March 21, 1986
LIC-86-076

Mr. Ashok C. Thadani, Project Director
PWR Project Directorate #8
Division of PWR Licensing - B
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

- References: (1) Docket No. 50-285
(2) Letter, NRC (J.R. Miller) to OPPD (W.C. Jones) dated July 11, 1984
(3) Letter, OPPD (R.L. Andrews) to NRC (J.R. Miller) dated September 28, 1984 (LIC-84-323)
(4) Letter, OPPD (R.L. Andrews) to NRC (A.C. Thadani) dated December 30, 1985 (LIC-85-523)

Dear Mr. Thadani:

Milestones for Implementation of
Inadequate Core Cooling Instrumentation System

In References 2,3, and 4, the milestones for implementation of the inadequate core cooling instrumentation system were detailed. Most recently, Reference 4 informed you of our plans to delay declaration of final operability for an additional fuel cycle. Because of equipment failures and the relative uncertainty of the reliability of the equipment at the time, OPPD felt it would not be possible to proceed according to our Reference 3 schedule.

Subsequent to Reference 4, conference calls have been held between members of your staff and OPPD personnel. Based on the results of those conference calls, OPPD plans to implement the inadequate core cooling instrumentation system in accordance with the following schedule:

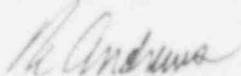
OPPD will complete the final stages of the system in time for submittal of the implementation letter report, 6 months following the 1985 outage, excluding repair of those components which are of concern due to failure. The repair/replacement of those components will be undertaken during the 1987 refueling outage.

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Six months following completion of the 1985 refueling outage (by July 6, 1986), OPPD will submit the implementation report letter. This is consistent with Reference 3. This letter will be sent in conjunction with an application for Amendment containing proposed Technical Specifications for the ICCI System. As noted in our recent telephone calls, the proposed Technical Specifications will be less restrictive than the Standard Technical Specifications. In Reference 3, OPPD's schedule allowed ninety (90) days for NRC review and approval of our plant-specific installation. As we now understand it, this process will require considerably less than the allotted ninety days. However, OPPD's schedule included 90 days plus the milestone-established sixty (60) days after approval in order to complete training, upgrade procedures, etc. Therefore, our implementation letter report and the Application for Amendment will request that those Technical Specifications be made effective 150 days from submittal or 60 days from NRC approval, whichever is later. We believe this is a workable solution to the question of implementation of the ICCI system. If you have questions concerning this schedule clarification, please contact us.

Sincerely,



R. L. Andrews
Division Manger
Nuclear Production

RLA/DJM/me

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Ave., N.W.
Washington, DC 20036

E. G. Tourigny, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector